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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARGARET LOUISE SIMPSON,

Plaintiff,

v.

CAROLYN W. COLVIN,
Acting Commissioner of Social Security,

Defendant.

)
) Case No. 2:16-cv-01074-APG-GWF
)

) **JOINT STIPULATION FOR EXTENSION OF**
) **TIME TO FILE DEFENDANT'S NOTICE OF**
) **VOLUNTARY REMAND OF THE CASE OR**
) **CROSS-MOTION TO AFFIRM**

) **(Second Extension Request)**
)

1 Plaintiff Margaret Louise Simpson (Plaintiff) and Defendant Carolyn W. Colvin, Acting
2 Commissioner of Social Security (Defendant), stipulate, with the approval of this Court, to an
3 extension of time to file Defendant's Notice Of Voluntary Remand Of The Case or Cross-Motion To
4 Affirm by thirty days from the current deadline of November 17, 2016 to **December 19, 2016**, with all
5 other dates in this Court's Order Concerning Review Of Social Security Cases extended accordingly.
6 This is Defendant's second request for an extension.

7
8 Good cause exists to grant Defendant's request for extension. Defendant respectfully requests
9 additional time to adequately review the record, assess and evaluate Plaintiff's arguments. Good cause
10 also exists because counsel for Defendant (Counsel) is currently on scheduled leave from November
11 10, 2016 through November 14, 2016. Counsel needs additional time to complete the agency review's
12 process for new attorneys, which requires additional levels of review. Consequently, Defendant
13 respectfully requests additional time to properly respond to the issues Plaintiff raised in her Motion.

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1 Defendant makes this request in good faith with no intention to unduly delay the proceedings.
2 Plaintiff has no objection and has stipulated to the requested relief.
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4 Respectfully submitted,

5 Date: November 10, 2016

6 By: /s/*Lindsay Osterhout
7 LINDSAY OSTERHOUT
8 *by email authorization on 11/9/16
Attorney for Plaintiff

9 Date: November 10, 2016


DANIEL G. BOGDEN
United States Attorney
HOLLY A. VANCE
Assistant United States Attorney

12 By: /s/ Roya Massoumi
13 ROYA MASSOUMI
Special Assistant United States Attorney

14 Of Counsel:
15 TINA L. NAICKER
16 Assistant Regional Counsel
Attorneys for Defendant

17 **IT IS SO ORDERED.**
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21 DATE: November 14, 2016


22 THE HONORABLE GEORGE W. FOLEY
23 United States Magistrate Judge
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CERTIFICATE OF SERVICE

I, ROYA MASSOUMI, certify that the following individual was served with a copy of the **JOINT STIPULATION FOR EXTENSION OF TIME TO FILE DEFENDANT'S NOTICE OF VOLUNTARY REMAND OF THE CASE OR CROSS-MOTION TO AFFIRM (Second Extension Request)** on the date and via the method of service identified below:

CM/ECF:

David J. Otto, Esq.
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Lindsay F. Osterhout, Esq.
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Attorneys for Plaintiff
MARGARET LOUISE SIMPSON

Respectfully submitted this 10th day of November 2016,

/s/ Roya Massoumi
ROYA MASSOUMI
Special Assistant United States Attorney